



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

1595 Wynkoop Street  
DENVER, CO 80202-1129  
Phone 800-227-8917  
<http://www.theEPA.gov/region08>

Ref: 8ENF-AT

**AUG 17 2011**

James A. Hewlett, General Manager  
Intermountain Power Agency  
10653 S. River Front Parkway  
South Jordan, Utah 84095

Environmental Manager  
Intermountain Power Service Company  
850 West Brush Wellman Road  
Delta, UT 84624

RE: Request for Information Pursuant to Section 114 of the Clean Air Act

Dear Mr. Hewlett:

The U.S. Environmental Protection Agency (the EPA) is requiring Intermountain Power Agency (IPA) and Intermountain Power Service Company (IPSC) to submit certain information for the Intermountain Generating Station in or near Delta, Utah, which is owned by IPA and operated by IPSC. The EPA expects IPA and IPSC will coordinate this effort and submit a single response. Under 40 C.F.R. Part 2, Subpart B, you may assert a claim of business confidentiality for any portion of the submitted information. You must specify the page, paragraph, and sentence when identifying the information subject to your claim. Appendix A specifies the assertion and substantiation requirements for business confidentiality claims. Appendix B contains instructions and definitions that you should use to provide the requested information. Appendix C specifies the information that you must submit pertaining to your facilities. You must send a response to the EPA within thirty (30) calendar days after you receive this request.

The EPA is issuing this information request under section 114(a) of the Clean Air Act (the Act), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of the EPA to require the submission of information. The Administrator has delegated this authority to the Assistant Regional Administrator for the Office of Enforcement, Compliance, and Environmental Justice in Region 8.

IPA (or its subsidiary) owns and IPSC (or its subsidiary) operates the Intermountain Generating Station, near Delta, Utah. The EPA is requesting this information to determine whether your emission sources are complying with the Clean Air Act.

All required information for the Intermountain Power Generating Stations shall be sent to:

U.S. Environmental Protection Agency – Region 8  
1595 Wynkoop Street  
Mail Code: 8ENF-AT  
Denver, Colorado 80202-1129  
Attention: Joshua Rickard

IPA must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

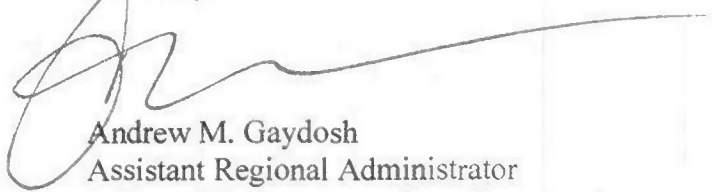
The EPA may use any information submitted in response to this request in an administrative, civil, or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic record keeping efforts, please provide your response to this request for information without staples. Paper clips and binder clips are acceptable.

Failure to comply fully with this request for information may subject Intermountain Power Agency to an enforcement action under section 113 of the Act, 42 U.S.C. § 7413.

Should you have any questions about this request for information, please contact Joshua Rickard at (303) 312-6460.

Sincerely,



Andrew M. Gaydosh  
Assistant Regional Administrator  
Office of Enforcement, Compliance and  
Environmental Justice

Enclosures:

- 1) Appendix A
- 2) Appendix B
- 3) Appendix C

## Appendix A

### Confidential Business Information (CBI) Assertion and Substantiation Requirements

#### A. Assertion Requirements

You may assert a business confidentiality claim covering all or part of the information requested in the attached letter, as provided in 40 C.F.R. § 2.203(b). To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a legend to indicate the intent to claim confidentiality. The stamped or typed legend, or other suitable form of notice, should employ language such as "trade secret" or "proprietary" or "company confidential" and indicate a date if any when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by the U.S. Environmental Protection Agency only to the extent permitted and by means of the procedures set forth by Section 114(c) of the Clean Air Act (the Act), and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. The EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

Please segregate personnel, medical and similar files from your responses and include that information on separate sheet(s) marked as "Personal Privacy Information" given that disclosure of such information to the general public may constitute an invasion of privacy.

#### B. Substantiation Requirements

All confidentiality claims are subject to the EPA verification and must be made in accordance with 40 C.F.R. § 2.208 which provides in part that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been reasonably obtainable by legitimate means without your consent.

Pursuant to 40 C.F.R. Part 2, Subpart B, the EPA may at any time send you a letter asking you to substantiate fully your CBI claim. If you receive such a letter, you must provide the EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and the EPA may release the information. If you receive such a letter, the EPA will ask you to specify which portions of the information you consider confidential. **You must be specific by page, paragraph, and sentence when identifying the information subject to your claim.** Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being subject to CBI, you must answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to the EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to the EPA of similar information in the future.
8. Any other issue you deem relevant.

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2. "Emission data" means, with reference to any source of emission of any substance into the air-

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. §§ 2.301(a)(2)(i)(A), (B) and (C).

Emission data includes, but is not limited to, service records stating the amount of refrigerant added to a unit or reclaimed from a unit.

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by the EPA only to the extent allowed by, and by means of the procedures set forth in, 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you



## **Appendix B**

When providing the information requested in Appendix C, use the following instructions and definitions.

### **INSTRUCTIONS**

1. Provide a separate narrative response to each question and subpart of a question set forth in the Information Request.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer identify the person(s) that provided information that was used or considered in responding to that question, as well as each person that was consulted in the preparation of that response.
3. Indicate on each document produced in response to this Information Request, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information is not available or in your possession and identify any source that either possesses or is likely to possess such information.

## DEFINITIONS

All terms used in this Request for Information will have their ordinary meaning unless such terms are defined in the Clean Air Act (the Act), 42 U.S.C. §§ 7401 *et. seq.*, 40 C.F.R. Part 52 (which incorporates the Federally-approved Stated Implementation Plan), or other Clean Air Act implementing regulations. Reference is made to the EPA regulatory provisions only; however, you should apply the applicable Federally-approved state provisions when appropriate. Definitional clarification is specified below.

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by the EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any document.
2. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
3. The terms "Intermountain Power Agency" and "IPA" shall mean Intermountain Power Agency, and all subsidiaries and related entities.
4. The terms "Intermountain Power Service Corporation" and "IPSC" shall mean Intermountain Power Service Corporation, and all subsidiaries and related entities.
5. The term "facility" shall mean both Units 1 & 2 located at the Intermountain Generating Station, near Delta, Utah.
6. The term "coal-fired generating unit" shall mean all equipment used for the purpose of generating steam or electricity including but not limited to coal handling facilities, boilers, ductwork, stacks, turbines, generators, and all ancillary equipment.
7. The term "Btu" shall mean the British thermal unit of heat.
8. The term "capacity factor" shall mean the percentage of total gross megawatts hours produced by the coal-fired boiler compared to the total amount of megawatts hours that could have been produced at 100% equivalent availability factor for a given time period. Specify the maximum gross megawatt value used in calculating capacity factor.



9. The term “equivalent availability factor” shall mean the percentage of gross megawatt hours the coal-fired boiler was actually mechanically available to generate electricity in any amount compared to the maximum amount of gross megawatt hours the unit would theoretically be able to produce for a given time period without any mechanical restrictions (forced outage or deratings) to the existing coal-fired boiler. Specify the maximum gross megawatt value used in calculating equivalent availability factor.

## Appendix C

Provide the following information in complete, unredacted format using the instructions and definitions provided in Appendix B. If the information was already provided in the previous 114 response, it need not be resubmitted, but cite where in the response the information was provided.

- 1) Provide the dates of performance evaluation or testing of the overfire air system (referred to in the response to the EPA's original September 28, 2010 CAA Section 114 request) for Units 1 & 2 at the facility.
- 2) Provide copies of all draft and final reports of any engineering studies or analyses conducted by IPA/IPSC, or its contractors, to assess potential NO<sub>x</sub> reduction systems for Units 1 & 2 at the facility, including, but not limited to, overfire air, in the five years prior to the installation of overfire air on Units 1 & 2.
- 3) Describe the scope and extent of the addition of the overfire air systems to Units 1 and 2 at the facility including:
  - a) a description of new overfire air ports that were installed;
  - b) the location of new overfire air ports relative to the existing burners;
  - c) any necessary modifications made to the existing burners due to the overfire air system;
  - d) the scope of any increased total intake air;
  - e) the design percentage of the total combustion air diverted to the overfire air ports; and
  - f) any monitoring equipment installed for operation of the overfire air system.
- 4) Provide copies of all draft and final vendor contracts for the installation of the overfire air system on Units 1 & 2 at the facility.
- 5) Provide documentation that describes the expected and/or guaranteed NO<sub>x</sub> control efficiency and/or outlet emission rates (lb/MMBtu) for the over fire air system installed at Units 1 and 2 at the facility. Documentation should also include all specified boiler and/or overfire air system operating condition requirements to meet these NO<sub>x</sub> control efficiency and/or outlet NO<sub>x</sub> emission rates.
- 6) Provide draft and final test reports including any supporting data demonstrating the vendor performance guarantees for the overfire air system on Units 1 and 2 at the facility. This should include the NO<sub>x</sub> control efficiency and/or outlet NO<sub>x</sub> emission rate data related to all test runs and all operational data of the overfire air system and boiler that was monitored during the test, including, but not limited to, such data specified by the purchase contract for the overfire air system on Units 1 and 2. In the event that it is

necessary for you to secure the agreement of any other party or entity to produce any of the information covered by these requests, for example, due to any license agreements or confidentiality claims by a software firm, please contact the other party or entity to seek authorization in order to permit disclosure of the requested information. Should you be unable to secure such authorization from any other party or entity with a confidentiality or proprietary claim over the requested information, please specifically identify the nature of the issue that is preventing the disclosure of the information in your response

- 7) Provide the dates of scrubber wall ring installation (referred to in the response to the EPA's original September 28, 2010 CAA Section 114 request) and dates of scrubber system performance evaluation or testing before and after the installation of the rings for Units 1 & 2 at the facility.
- 8) Provide copies of all draft and final reports of any engineering studies or analyses conducted by IPA/IPSC, or its contractors, to assess potential SO<sub>2</sub> reduction systems for Units 1 & 2, including, but not limited to, the scrubber wall rings, in the five years prior to the installation of scrubber wall rings on Units 1 & 2 at the facility.
- 9) Describe the scope and extent of the addition of the scrubber wall rings to Units 1 and 2 at the facility.
- 10) Provide copies of all draft and final vendor contracts for the installation of the scrubber wall rings on Units 1 & 2 at the facility.
- 11) Provide documentation that describes the expected and/or guaranteed SO<sub>2</sub> control efficiency and/or outlet emission rates (lb/MMBtu) for the scrubbers after the installation of the wall rings on Units 1 and 2 at the facility. Documentation should also include all boiler operation, scrubber operation, and fuel condition requirements specified to meet these SO<sub>2</sub> control efficiency and/or outlet SO<sub>2</sub> emission rates.
- 12) Provide draft and final test reports including any supporting data demonstrating the vendor performance guarantees for the scrubber system after the wall ring upgrades on Units 1 and 2 at the facility. This should include the SO<sub>2</sub> control efficiency and/or outlet SO<sub>2</sub> emission rate data related to all test runs and all fuel characteristic data and operational data of the scrubber system and boiler that was monitored during the test, including, but not limited to, such data specified by the purchase contract of the scrubber wall rings for Units 1 and 2.

- 13) Provide all annual reports of post-change actual emissions submitted to the Utah Department of Air Quality (UDAQ) by IPA/IPSC in accordance with the Approval Order to increase the capacities of Units 1 & 2, issued by UDAQ on January 11, 2002 (or any subsequent modifications).
- 14) In response to the EPA's original September 28, 2010 114 request, IPA/IPSC indicated that the following projects were completed on Unit 2 around May 2002.
- HP Turbine Dense Pack
  - Circulating Water Makeup Bypass
  - Boiler Safety Relief Capacity
  - Isolated Phase Bus Duct Cooling
  - Boiler Feed Pump Re-rate

However, in response to Question 6 of the September 28, 2010 114 request, the following information was found to be missing: the date (month and year) the work was completed or projected to be completed, the project work order number, and the dollar amount approved and/or expended. Provide this information.

- 15) For Units 1 & 2, provide the following on a monthly and annual basis from the date of startup of the unit to the date of this request. To the extent available, please provide in computer readable format, such as a Microsoft Excel spreadsheet or other accessible format:
- a. fuel consumption quantity (mass basis for solid fuels, volume basis for any gaseous fuels), including description of fuel type (e.g. bituminous coal, subbituminous coal, petroleum coke, etc.) and percentage of total fuel use for that unit on a Btu basis, and
  - b. fuel quality (e.g., % sulfur, % ash, and heat content).
- 16) For each coal-fired generating unit at this facility, provide a list of all physical modifications or additions made to the fuel handling system or the electric stream generating unit of an amount greater than \$20,000 completed with the purpose of allowing the facility to use fuels other than bituminous coal. For each such project, identify the work performed, the date (month and year) the work was completed or projected to be completed, the project work order number, the dollar amount approved and/or expended, and the fuel type for which the modifications were made.
- 17) For each coal-fired generating unit at this facility, provide copies of all documents, including reports, correspondence, memoranda, and phone discussion summaries, related to PSD, NSR, or New Source Performance Standards (NSPS) applicability for the use of fuel other than bituminous coal, if such fuel was actually combusted at the facility.

- 18) For each coal-fired generating unit at this facility, provide a copy of any emissions calculations performed before or after, including any test reports, showing the affect of introducing the use of any fuel other than bituminous coal, if such fuel was actually combusted at the facility.
- 19) Provide all documents setting forth the final inputs and outputs for any production costing modeling or simulations, projecting or reflecting, wholly or in part, the impact of the construction projects listed in Attachment A on the operation of IPA/IPSC's Intermountain Generating Station. For this request, include any documents reflecting the modified unit's expected or projected post-project coal usage (including, if available, coal sulfur content), heat input, heat rate, megawatt capacity, service hours, and/or placement in the system dispatch order post project. The term "production costing modeling" specifically refers to any simulation modeling using any version of GE-MAPS, PROSYM, Proscreen, Energy Costing Program, Strategist, PROMOD, MarketSym, PowerWorld, Inter-Regional Electricity Market Model, or other similar software package.
- 20) For the years 2000 through 2005 inclusive, provide all final inputs used in, and outputs from, any production costing modeling or simulations conducted on the operation of IPA/IPSC's generating resources that were (1) generated, used or consulted to prepare or support any submission to a state or federal regulatory body or (2) used to develop fuel budgets or plan fuel procurement for the IPA/IPSC's generating resources. In addition, provide any documents reflecting each unit's expected or projected availability (forced outage rate), coal usage (including, if available, coal sulfur content), heat input, heat rate, megawatt capacity, service hours, and/or placement in the system dispatch order covering the year before and two years after the time period modeled. The term "production costing modeling" has the same meaning as in Question 19 above.
- 21) For each production costing modeling simulation, modeling run, or other document responsive to Question 19 & 20 above, provide a brief description of the purpose or purposes for which the model was run and the software package used. Provide all input and output data files, all input and output reports, all generating unit characteristics used in the modeling (including, but not limited to, projected unit capacity, unit derates, unit heat rates, forced outages, scheduled outages, maintenance outages, unit availability, etc.), all documents utilized in the development of the input values, all assumptions, and any other information necessary for the EPA to understand the model and run the model. Provide all inputs, outputs, and work papers in native electronic format (*e.g.* in Microsoft Excel format), and if the original document was created in Excel or similar spreadsheet format, provide the spreadsheet with all formulas intact.

22) With regard to requests 19 through 21 above, provide any user manuals, guides, training documents, or other documents needed or helpful for the EPA to understand and use the software or modeling package that you used to generate the model runs or other responsive documents produced.

23) Provide a copy of any and all correspondence with the State or any regulatory agency, not previously provided, regarding the potential applicability or exemption of any provision of the CAA or the applicable State Implementation Plan (SIP), including but not limited to New Source Review/Prevention of Significant Deterioration (NSR/PSD), and New Source Performance Standards (NSPS), for the construction projects listed in Table 1 below

**Table 1: Construction Activities**

Plant	Unit	Approximate Outage Dates <sup>1</sup>	Description <sup>2</sup>
Intermountain Power	1	May 2003	IPA/IPSC planned to increase Unit 1's capacity from 875 MW to 950 MW gross during the Unit 1 capacity increase
Intermountain Power	2	May 2002	IPA/IPSC planned to increase Unit 2's capacity from 875 MW to 900 MW gross during the Unit 2 capacity increase.
Intermountain Power	2	May 2004	IPA/IPSC planned to increase Unit 2's capacity from 900 MW to 950 MW gross during the Unit 1 capacity increase

24) Provide a complete electronic (Microsoft Excel compatible) set of all Generating Availability Data System (GADS) performance data (including monthly and annual reports showing all parameters including but not limited to hours of operation, availability, coal used, forced outages including EFOR (Equivalent Forced Outage Rate), capacity factors, etc.) for the period from January 1992 to the date of this request for IPA/IPSC's Intermountain Generating Station.

<sup>1</sup> The dates provided represent approximate dates the construction activities were completed.

<sup>2</sup> The list of activities described is not intended to be an exhaustive list, but rather a description of the major work completed.

CERTIFICATE OF MAILING

I, Andrea Reed, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:


James A. Hewlett, General Manager  
Intermountain Power Agency  
10653 S. River Front Parkway  
Suite 120  
South Jordan, Utah 84095

Environmental Manager  
Intermountain Power Service Company  
850 West Brush Wellman Road  
Delta, UT 84624

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by First-Class Mail to:

Harold Burge, Administrator  
Utah Division of Air Quality  
Air Quality Program

on the 18<sup>th</sup> day of August 2011.

  
Andrea Reed, Secretary

Certified Mail Receipt Number: 7009 3410 0000 2594 6585

7009 3410 0000 2594 6592

